

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

2012 SEP 12 PM 2:00

DEPUTY CLERK ASD

UNITED STATES OF AMERICA

v.

SHANICE ADEL LAMBERT

§
§
§
§
§

No. 2:12-CR-043-J

The Grand Jury Charges:

INDICTMENT

Count One

Production of Child Pornography
(Violation of 18 U.S.C. §§ 2251(a) and 2)

In or about February 2012, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Shanice Adel Lambert**, defendant, did use, persuade, induce, and entice, and attempt to do so, John Doe, a minor, being a person under the age of eighteen (18) years, to engage in sexually explicit conduct, that is, lascivious exhibition of the genitals and pubic area of said minor, for the purpose of producing a visual depiction of such conduct, resulting in the production of an image of the minor's erect penis, and which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and knowing, and having reason to know, that such visual depiction would be transported using any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

Count Two
Enticement of a Minor
(Violation of 18 U.S.C. §§ 2422(b) and 2)

In or about February 2012, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Shanice Adel Lambert**, defendant, did knowingly, by means of cellular telephone communication and telephone texting, a facility and means of interstate and foreign commerce, persuade, induce, and entice, and attempt to do so, John Doe, an individual who had not attained the age of eighteen (18) years, to engage in sexual activity for which **Lambert** could be charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2422(b) and 2.

Count Three

Transportation of a Minor with Intent to Engage in Criminal Sexual Activity
(Violation of 18 U.S.C. §§ 2423(a) and 2)

On or about February 11, 2012, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Shanice Adel Lambert**, defendant, did knowingly transport John Doe, an individual who had not attained the age of eighteen (18) years, in interstate commerce, that is, from the State of Texas to the State of Oklahoma, with intent that said minor engage in sexual activity for which **Lambert** could be charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2423(a) and 2.

Count Four

Transportation of a Minor with Intent to Engage in Criminal Sexual Activity
(Violation of 18 U.S.C. §§ 2423(a) and 2)

On or about February 19, 2012, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Shanice Adel Lambert**, defendant, did knowingly transport John Doe, an individual who had not attained the age of eighteen (18) years, in interstate commerce, that is, from the State of Texas to the State of Oklahoma, with intent that said minor engage in sexual activity for which **Lambert** could be charged with a criminal offense.

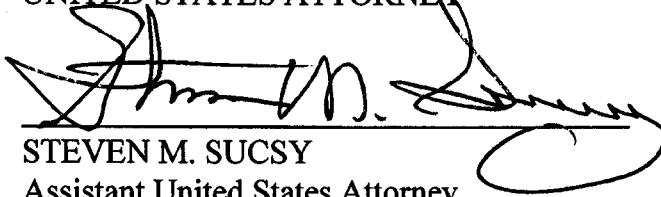
In violation of Title 18, United States Code, Sections 2423(a) and 2.

A TRUE BILL



FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY



STEVEN M. SUCSY
Assistant United States Attorney
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

THE UNITED STATES OF AMERICA

v.

SHANICE ADEL LAMBERT

INDICTMENT

18 U.S.C. § 2251(a),
Production of Child Pornography
(One count)

18 U.S.C. § 2422(b),
Enticement of a Child
(One count)

18 U.S.C. § 2423(a),
Transportation of a Child with Intent to Engage in Criminal Sexual Activity
(Two counts)

A true bill rendered,

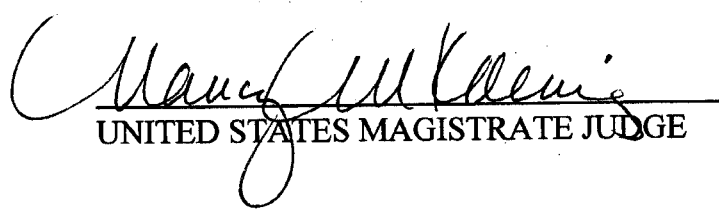
LUBBOCK, TEXAS

Foreperson 

Filed in open court this 12th day of September, A.D. 2012.

Clerk

SUMMONS TO ISSUE


UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**
RELATED CASE INFORMATION

 Superseding Indictment/Information Yes X No
 New Defendant: Yes X No

 Pending CR Case in NDTX: Yes X No

 If Yes, number: _____
 Search Warrant Case Number _____
 Rule 20 from District of _____

1. DEFENDANT INFORMATION

 Juvenile: Yes X No

 Matter to be sealed:
 Yes X No

 Defendant Name SHANICE ADEL LAMBERT

Alias Name _____

 Address _____
REDACTED _____

 County in which offense was committed: Childress
2. U.S. Attorney Information

 AUSA STEVE SUCSY

 Bar # 19459200
3. Interpreter
 Yes X No

If Yes, list language and/or dialect: _____

4. Location Status

Arrest Date _____

 Already in Federal Custody as of _____ in _____

 Already in State Custody

 On Pretrial Release

5. U.S.C. Citations

 Total # of Counts as to This Defendant: 3 : Petty Misdemeanor Felony X

Citation	Description of Offense Charged	Count(s)
<u> 18 USC 2251(a) </u>	<u> Production of a Child Pornography </u>	<u> 1 </u>
<u> 18 USC 2422(b) </u>	<u> Enticement of a Minor </u>	<u> 2 </u>
<u> 18 USC 2423(a) </u>	<u> Transporting a Minor to Engage in </u>	<u> 3 and 4 </u>
<u> </u>	<u> Criminal Sexual Activity </u>	<u> </u>

 Date 9-12-12

Signature of AUSA:

 STEVEN M. SUCSY